

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:16-CR-308-1BO(4)

FILED IN OPEN COURT
ON 12-13-2016
Julia Richardson, Clerk
US District Court
Eastern District of NC JMA

UNITED STATES OF AMERICA)
)
 v.) INDICTMENT
)
 TAVARES LAJUANE GRAHAM)

The Grand Jury charges that:

COUNT ONE

On or about May 25, 2016, in the Eastern District of North Carolina, TAVARES LAJUANE GRAHAM did knowingly and intentionally possess with the intent to distribute 500 grams or more of cocaine and 28 grams or more of cocaine base (crack), both Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

On or about May 25, 2016, in the Eastern District of North Carolina, TAVARES LAJUANE GRAHAM did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, did knowingly and intentionally possess with the intent to distribute 500 grams or more of cocaine and 28 grams or more of cocaine base (crack),

both Schedule II controlled substances, as alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

On or about May 25, 2016, in the Eastern District of North Carolina, the defendant, TAVARES LAJUANE GRAHAM, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

[Remainder of page intentionally left blank]

FORFEITURE NOTICE

As a result of the foregoing offense in Counts One and Two, the defendant shall forfeit to the United States any and all of the defendant's interest in property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation, or any property traceable to such property.

In addition, as a result of the foregoing offenses in Counts Two and Three, the defendant shall forfeit to the United States any and all of the defendant's interest in any firearms and ammunition involved in or used in a knowing violation of Title 18, United States Code, Section 922(g) and 924(c), under the provisions of Title 18, United States Code, Section 924(d)(1), as made applicable by Title 28, United States Code, Section 2461(c).

The forfeitable property includes, but is not limited to, the following:

- (a) \$271.00 in U.S. currency;
- (b) Amadeo revolver, model .38 special, with Serial Number W328812;
- (c) a 9mm magazine; and
- (d) all accompanying ammunition.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

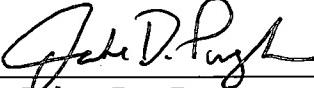
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 12/13/16

JOHN STUART BRUCE
United States Attorney



BY: Jake D. Pugh
Assistant U.S. Attorney